

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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PAUL SPINELLI; SCOTT BOEHM; PAUL
JASIENSKI; GEORGE NEWMAN LOWRANCE; : Case 1:13-cv-07398 (RWS)
DAVID STLUKA; DAVID DRAPKIN; and THOMAS
E. WITTE, : **ECF Case**

Plaintiffs, :

v. : **NOTICE OF MOTION TO
STAY DISCOVERY**

NATIONAL FOOTBALL LEAGUE; NFL :
PROPERTIES, LLC; NFL VENTURES, L.P.; NFL :
PRODUCTIONS, LLC; NFL ENTERPRISES, LLC; :
REPLAY PHOTOS, LLC; GETTY IMAGES (US), :
INC.; ASSOCIATED PRESS; ARIZONA :
CARDINALS HOLDINGS, INC., ATLANTA :
FALCONS FOOTBALL CLUB LLC, BALTIMORE :
RAVENS LIMITED PARTNERSHIP, BUFFALO :
BILLS, INC., PANTHERS FOOTBALL LLC, :
CHICAGO BEARS FOOTBALL CLUB, INC., :
CINCINNATI BENGALS, INC., CLEVELAND :
BROWNS LLC, DALLAS COWBOYS FOOTBALL :
CLUB, LTD., DENVER BRONCOS FOOTBALL :
CLUB, DETROIT LIONS, INC., GREEN BAY :
PACKERS, INC., HOUSTON NFL HOLDINGS LP, :
INDIANAPOLIS COLTS, INC., JACKSONVILLE :
JAGUARS LTD., KANSAS CITY CHIEFS :
FOOTBALL CLUB, INC., MIAMI DOLPHINS, LTD., :
MINNESOTA VIKINGS FOOTBALL CLUB LLC, :
NEW ENGLAND PATRIOTS, LP, NEW ORLEANS :
LOUISIANA SAINTS, LLC, NEW YORK :
FOOTBALL GIANTS, INC., NEW YORK JETS :
FOOTBALL CLUB, INC., OAKLAND RAIDERS LP, :
PHILADELPHIA EAGLES FOOTBALL CLUB, INC., :
PITTSBURGH STEELERS SPORTS, INC., SAN :
DIEGO CHARGERS FOOTBALL CO., SAN :
FRANCISCO FORTY NINERS LTD., FOOTBALL :
NORTHWEST LLC, THE RAMS FOOTBALL CO. :
LLC, BUCCANEERS LIMITED PARTNERSHIP, :
TENNESSEE FOOTBALL, INC., and :
WASHINGTON FOOTBALL INC., :

Defendants.

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PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and upon all prior pleadings and proceedings had herein, defendants National Football League, NFL Properties, LLC, NFL Ventures, L.P., NFL Productions, LLC, NFL Enterprises, LLC, the 32 National Football League Clubs (collectively the “NFL Clubs”), The Associated Press, and Replay Photos, LLC will move this Court, before the Honorable Robert W. Sweet, United States District Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, on a date and at a time designated by the Court, for an order pursuant to Fed. R. Civ. P. 26(c) staying all discovery pending resolution of defendants’ respective motions to dismiss the First Amended Complaint, and for such other and further relief as this Court may deem just and proper.

Dated: New York, New York
November 10, 2014

/s Anthony J. Dreyer
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